

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OHIO

Dr. Tobias R. Reid, Ph.D., (AREA)
1586 Larchmont Drive
Cleveland, Ohio 44110

-vs-

Bahman Ghorashi, Dean of Fenn
College of Engineering
2121 Euclid Avenue
Cleveland, Ohio 44115

And;

Majid Rashidi, Ph.D., P.E.
2121 Euclid Avenue
Cleveland, Ohio 44115

And;

Larry Dolan, Owner Cleveland Indians
2401 Ontario Street
Cleveland, Ohio 44115

1:11 CV 2186
Case No.
JUDGE GWIN

Complaint; Property Rights
Violations; Copyrights,
Patents, and Trademark
Jury Demand.

MAG. JUDGE BAUGHMAN

MAG. JUDGE BAUGHMAN

Complaint for Property Rights Violations; Copy Rights, Patents,
and Trademark Infringement.

(1) Dr. Tobias R. Reid, Ph.D., (AREA), plaintiff, was a graduate Ph.D. candidate student at the Division of Continuing Education/ Fenn College of Engineering at Cleveland State University from August 2006 until October 2009. The program plaintiff was enrolled in was through the International Society of Arboriculture, Arboriculture Research and Education Academy known as AREA. During that time plaintiff was also a student intern at Lerner Research Institute at Cleveland Clinic with student advisor Dr. Jun-Qin Director of Molecular Biology Program, Little Ceasars Pizza located at East 105 Plaza in Cleveland, Ohio and Minute Men Staffing located on East 30th in Cleveland, Ohio. The purpose of these internships and studies were in developments of alternative energies, clinical engineering, and horticultural

therapies (Reid -vs- Martin, CA 87032; Reid -vs- Boylan, et. al., CCP 612907; Reid -vs- Gungor, South Euclid, Ohio, 2006; Reid, Ph.D. -vs- Johira, et. al. 738290, 2010). During the times of internships plaintiff developed and secured patents in alternative energies, clinical engineering and horticultural therapies (Reid -vs- U-Store-It, CCP 617974; City of Cleveland Heights -vs- Reid, Ph.D., CA96402; City of Cleveland -vs- Reid, 2010; Early, 2010; Reid, Jones and Williams, 2010; Reid, Ph.D. -vs- Hood, et. al., U.S. Ct. Reid, Stinson, and Williams, 2011). During the summer of 2008 the Cleveland Indians were again a competitive baseball team plaintiff was selected for internship at Jacobs field to study the AREA in which included recycling for energies, the rates and patterns of the wind channels; waveform shaping rates and logic (Facebook.com/ Tobias Reid, March, 2010; Reid -vs- Boylan, et. al., 2007). The second part of this study took place during the fall and winter of 2008 and from an internship at Little Ceasars Pizza located in East 105 plaza in Cleveland, Ohio. There plaintiff studies the content of radiant energy from the sun in which included power-generation, transmission and machinery functions (City of Cleveland -vs- Reid, 2009; Reid and Moore, 2009; City of Cleveland -vs- Reid, 2009; Reid, Howard and Tarver, 2009). The third part of this study took place during the summer and fall of 2009, plaintiff was a licensed engineer with the City of Cleveland and was licensed to collect recyclable metals within city limits, the City of Cleveland Heights also allowed plaintiff to collect recyclable materials in that plaintiff properly displayed license and insurance information (City of Cleveland Heights -vs- Reid, 2004; City of Cleveland Heights -vs- Reid, 2009; Schmitt and Buchanan, 2004, 2005, 2010). Plaintiff collected relevant material for probability and statistical analysis, energy, work and power, linear algebra, analytic geometry, differential equations and linear transformers (City of Cleveland Heights -vs- Reid, 2009; City of Cleveland -vs- Reid, 2009; Reid, Howard, and Tarver, 2009; City of East Cleveland -vs- Reid, 2009; Reid and Walker, 2009). The studies ended in September, 2009 with plaintiff submitting an abstract to the College of Science for 1st defense of dissertation (CSU Interdisciplinary Research Conference, 2009; Reid, Jones, and Williams, 2009; Reid and Riga, 2009). A prototype model was presented to Fenn College of Engineering and College of Science in March of 2010, the first prototype was presented in Reid -vs- Boylan, et. al., 2007; Reid, Meeker, and Greene and revamped and presented in Reid, Ph.D. -vs- Johira, et. al., 2010; Reid, Mazanec, Roller, Schoenberger and Sheehan, 2010, 2011.

(2) On or about the 12th day of October, 2011 The Cleveland Plain Dealer printed an article regarding a wind turbine with specifications and model of plaintiffs prototype presented in Reid -vs- Boylan, et. al., 2007; Reid, Meeker and Greene and Reid, Ph.D. -vs- Johira, et. al., 2010; Reid, Mazanec, Roller, Schoenberger and Sheehan, 2010, 2011. This prototype helix wind turbine was created by plaintiff in which Majid Rashidi has infringed upon in violation of patents secured by plaintiff. Cleveland State University has received a \$1.1 million grant from the U.S. Department of Energy based on plaintiff research and development for this turbine. The circuit theory with ac/dc circuit fundamentals, transformers, linear circuit analysis, transient analysis and frequency response was developed by plaintiff.

(3) On or about the year of 1989 then mayor of City of Cleveland Michael R. White and residents passed a "sin tax" in which created the funds to build "Gateway District" in the city of Cleveland. This "sin tax" came with law that protected inner city workers interest in Jacobs field, in particular the "clean-up" in which occurs after each game based on attendance secures employment for inner city Cleveland residents, the contract itself was awarded to Minute Men staffing located on East 30th in the City of Cleveland, Ohio. Defendant Larry Dolan has violated the terms of that agreement by infringement of plaintiffs patents allowing Majid Rashidi to construct, build and operate wind turbine on "Gateway District" property.

Claim for Infringement of Patent Study and Prototype

(a) Plaintiff request that the construction of Wind Turbine be suspended and defendants Bahnman Ghorashi and Majid Rashidi compensate plaintiff \$100,000.00 (One hundred Thousand Dollars) for research, development of wind turbine to be installed at Progressive Field.

(b) Plaintiff request that construction of Wind Turbine be suspended and defendants Bahnman Ghorashi and Majid Rashidi compensate plaintiff \$100,000.00 (One hundred Thousand Dollars) For prototype submitted to United States Department of Energy to be installed at Progressive Field.

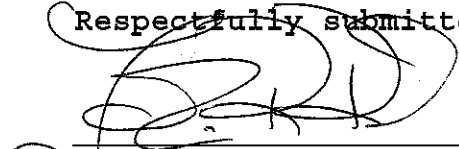
(c) Plaintiff request that Defendant Larry Dolan be required to compensate plaintiff \$100,000.00 (One hundred Thousand Dollars) for violation of 1989 "Sin Tax" in reallocating employment opportunities created for inner city Cleveland

residents to other contractors besides Minute Men Staffing located on East 30th Street in Cleveland, Ohio.

Conclusion

Plaintiff has patents secured on the designs, drawings, engineering of the system presented to the United States Department of Energy. Defendants have infringed on plaintiffs patents in violations of Federal laws, it is respectfully submitted that this court enforce any and all possible penalties for this infringement in accordance to federal law.

Respectfully submitted,

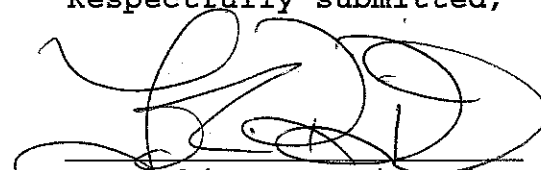


Dr. Tobias R. Reid, Ph.D.
1586 Larchmont Drive
Cleveland, Ohio 44110
dr.reid_csu_ce@yahoo.com

Certificate of Service

I hereby certify that a copy of the foregoing has been sent to Bahnman Ghorasi at Fenn College of Engineering at 2121 Euclid Avenue Cleveland, Ohio 44115 and to; Majid Rashidi, Ph.D., P.E. at Cleveland State University 2121 Euclid Avenue Cleveland, Ohio 44115 and to Larry Dolan, Esq. at 2401 Ontario Street Cleveland, Ohio 44115 this 14th day of October, 2011 by United States Marshall Service.

Respectfully submitted,



Dr. Tobias R. Reid, Ph.D.